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November 25, 2002

### **EX PARTE**

Ms Marlene H. Dortch Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554

Re: CC Docket No. 01-338

Dear Ms. Dortch:

On November 21, 2002, Bob Blau, Jon Banks, Pete Martin, Fred McCallum and the undersigned, all representing BellSouth, met with Michelle Carey, Tom Navin, Jeremy Miller, and Rob Tanner from the Competition Policy Division of the Wireline Competition Bureau in connection with the above referenced proceeding. During this meeting, BellSouth discussed its views on issues relating to the elimination of UNE switching and UNE transport. BellSouth explained that it offered a number of Enhanced Extended Loop (EELS) arrangements including DS0 to DS1. Attached is a list of the various EELS which BellSouth's offers. Also attached are maps of the states where BellSouth operates which show the number of CLEC voice switches, collocation arrangements and CLEC fiber networks.

I am electronically filing this notice and the accompanying attachment in the above referenced proceeding. Please call me if you have any questions.

Yours Truly,

William W. Jordan

Attachments

cc:

Michelle Carey Jeremy Miller

Tom Navin Rob Tanner

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BellSouth's network but that are not priced in Attachment A, the CLEC may purchase such unbundled network element combinations at the sum of the stand-alone recurring and nonrecurring prices of the unbundled network elements which make up the combination.

#### 4.5 EEL Combinations

- 4.5.1 At the CLEC's request, BellSouth shall provide access to Currently Combined and Ordinarily Combined EELs.
- 4.5.2 BellSouth will not make auditing a precondition to converting special access services provided by BellSouth to unbundled network elements; however, after the special access services have been converted to unbundled network elements, BellSouth may audit CLEC records in order to verify the type of traffic being transmitted over loop/transport unbundled network element combinations. If, based on its audits, BellSouth concludes that a CLEC is not providing a significant amount of local exchange traffic over the facilities; BellSouth may file a complaint with the Commission. CLEC's requirements regarding certification of its provision of a significant amount of local exchange traffic and the definition of a "significant amount of local exchange traffic" shall be as set forth in the FCC's orders regarding same.

#### 4.6 **EELs**

4.6.1 BellSouth will provide access to EELs to provide connectivity from an end user's location through that end user's SWC to CLEC-1's POP serving wire center. The circuit must be connected to CLEC-1's switch for the purpose of provisioning telephone exchange service to CLEC-1's enduser customers. The EEL will be connected to CLEC-1's facilities in CLEC-1's collocation space at the POP SWC, or CLEC-1 may purchase BellSouth's access facilities between CLEC-1's POP and CLEC-1's collocation space at the POP SWC.

## 4.7 Currently Combined and Ordinarily Combined EEL Offerings:

- 4.7.1 DS1 Interoffice Channel + DS1 Channelization + 2-wire VG Local Loop
- 4.7.2 DS1 Interoffice Channel + DS1 Channelization + 4-wire VG Local Loop
- 4.7.3 DS1 Interoffice Channel + DS1 Channelization + 2-wire ISDN Local Loop
- 4.7.4 DS1 Interoffice Channel + DS1 Channelization + 4-wire 56 kbps Local Loop

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4.7.5	Loop  Loop
4.7.6	DS1 Interoffice Channel + DS1 Local Loop
4.7.7	DS3 Interoffice Channel + DS3 Local Loop
4.7.8	STS-1 Interoffice Channel + STS-1 Local Loop
4.7.9	DS3 Interoffice Channel + DS3 Channelization + DS1 Local Loop
4.7.10	STS-1 Interoffice Channel + DS3 Channelization + DS1 Local Loop
4.7.11	2-wire VG Interoffice Channel + 2-wire VG Local Loop
4.7.12	4-wire VG Interoffice Channel + 4-wire VG Local Loop
4.7.13	4-wire 56 kbps Interoffice Channel + 4-wire 56 kbps Local Loop
4.7.14	4-wire 64 kbps Interoffice Channel + 4-wire 64 kbps Local Loop

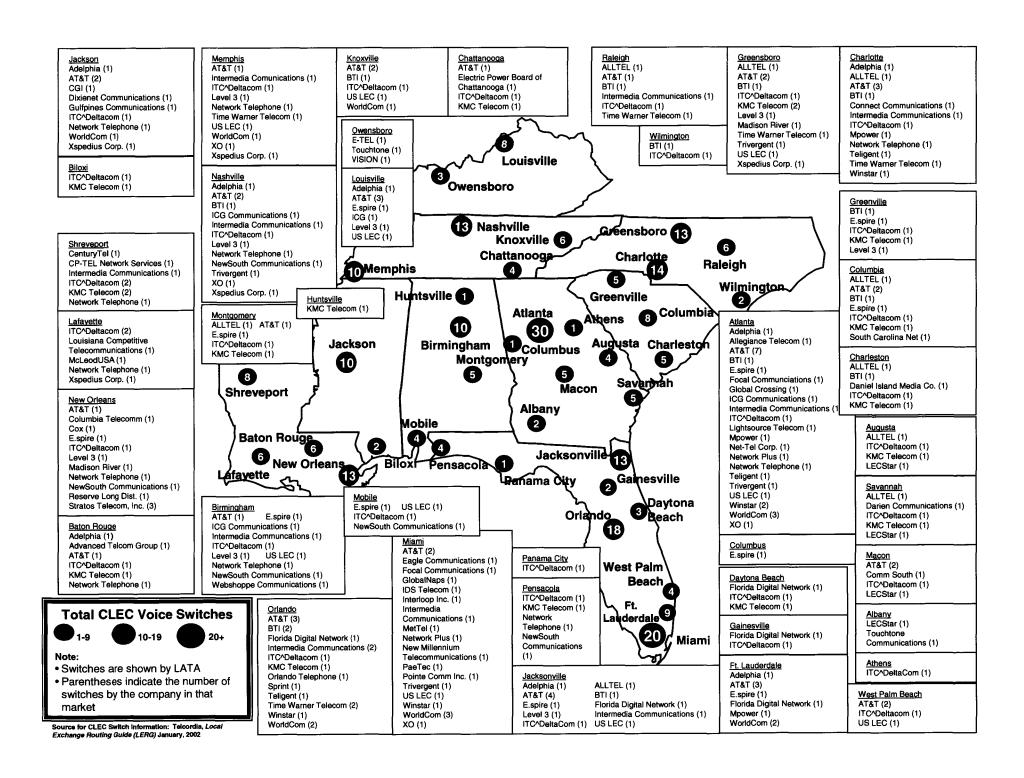
#### 4.8 Rates for EELs

4.8.1 Recurring and nonrecurring rates for Currently Combined and Ordinarily Combined EELs shall be as set forth in Attachment A. To the extent that a CLEC seeks to obtain EELs that are Currently Combined or Ordinarily Combined in BellSouth's network but that are not priced in Attachment A, the CLEC may purchase such EELS at the sum of the stand-alone recurring and nonrecurring prices of the unbundled network elements which make up the EEL.

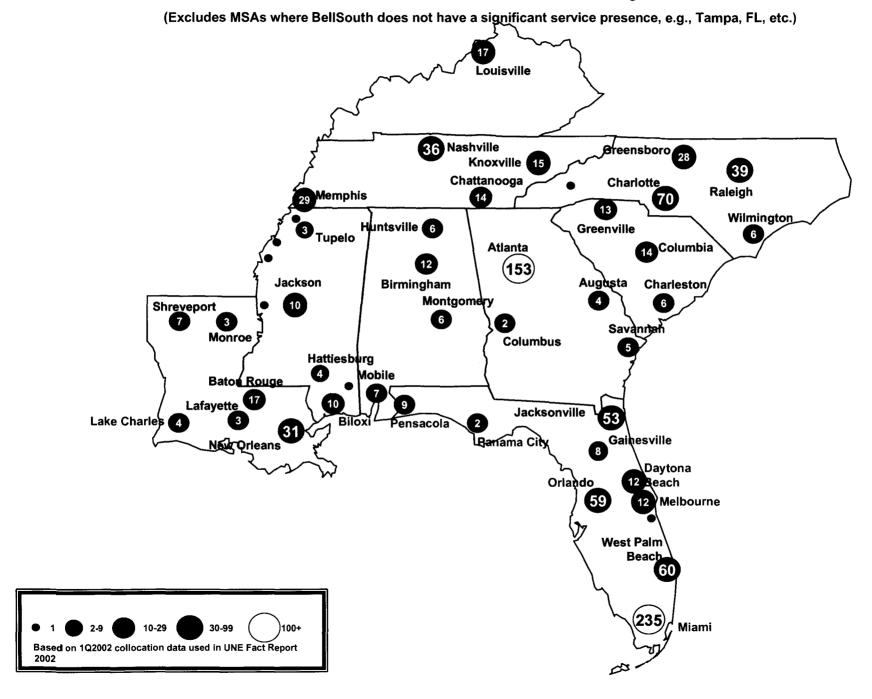
## 4.9 Assembly Points

- 4.9.1 Assembly Points are offered to provide CLECs the ability to combine unbundled network elements themselves within a BellSouth central office location, without requiring the CLEC to own or control any telecommunications equipment. The assembly products will be offered for three service types:
  - DS0 Assembly Point (immediate deployment)
  - DS1 Assembly Point (immediate deployment)
  - DS3 Assembly Point (future deployment)

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# Fiber-Based Collocation by MSA



## **Operational CLEC Fiber Networks by MSA**

(BellSouth MSAs Ranked in National Top 150, excluding MSAs where BellSouth does not have a significant service presence, e.g.,

